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18 Attorneys for Defendant  
19 **MICHAEL JOSEPH JACKSON**

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

FEB 19 2005

GARY M. BLAIR, Executive Officer  
*Carrie L. Wagner*  
CARRIE L. WAGNER, Deputy Clerk

*\*Unsealed pursuant  
to 6/16/05 court  
order*

**FILED UNDER SEAL**  
*W. J. Jackson*

20 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
21 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

22 THE PEOPLE OF THE STATE OF  
23 CALIFORNIA,

24 Plaintiffs,

25 vs.

26 MICHAEL JOSEPH JACKSON,

27 Defendant.

Case No. 1133603

EX PARTE APPLICATION TO FILE UNDER  
SEAL AND IN CAMERA

Honorable Rodney S. Melville

Date: ~~February 18, 2005~~

Time: 8:30 a.m.

Dept: SM 2

FILED 19 FEB 19 2005

28 TO THE CLERK OF THE ABOVE ENTITLED COURT:

29 Defendant requests that the Court issue an order that the accompanying Declaration of Brian  
30 Oxman Requesting Signature of Order modifying Subpoena to the Bank of the West and the

EX PARTE APPLICATION TO FILE UNDER SEAL

1 Venturas, accompanying Order, and accompanying documents, be filed under seal and for such other  
2 such further relief as the Court may deem just and proper. This request is based on the overriding  
3 interests of Mr. Jackson's rights to due process and a fair trial under the Fifth, Sixth and Fourteenth  
4 Amendments to the United States Constitution and Article I, Sections 1, 7, and 15 of the California  
5 Constitution.

6 In addition, Subpoenaed Parties have filed their motion for In Camera review. Mr. Jackson  
7 submits this Application and Declaration also for In Camera Review and not for public filing.  
8

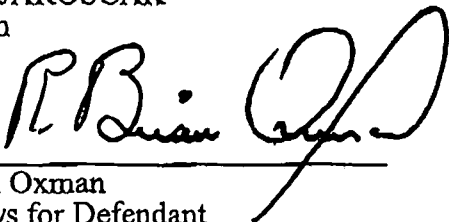
9 Dated: February 18, 2005

10 Respectfully submitted,

11 COLLINS, MESEREAU, REDDOCK & YU  
12 Thomas A. Mesereau, Jr.  
Susan C. Yu

13 SANGER & SWYSEN  
14 Robert M. Sanger

15 OXMAN & JAROSCAK  
16 Brian Oxman

17 By:   
18 R. Brian Oxman  
19 Attorneys for Defendant  
20 Mr. Michael Jackson  
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1 United States Constitution and Article I, Sections 1, 7, and 15 of the California Constitution.  
2 Material contained the accompanying document pertains to evidence and the testimony of  
3 witnesses that, if made public, would compromise Mr. Jackson's these rights and would result in  
4 prejudice to Mr. Jackson. In order to protect these overriding interests, it is necessary that the  
5 accompanying document be filed under seal.

6 CONCLUSION

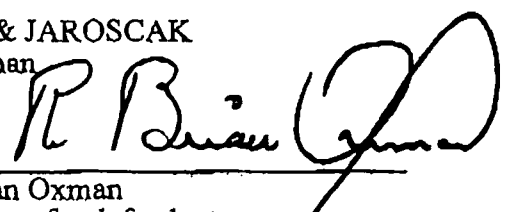
7 For the foregoing reasons, Mr. Michael Jackson requests the Declaration of Brian Oxman  
8 Requesting Signatur4e of Order modifying Subpoena to the Bank of the West and the Venturas  
9 and accompanying documents be filed under sea and In Camera.

10 Dated: February 18, 2005

11 COLLINS, MESEREAU, REDDOCK & YU  
12 Thomas A. Mesereau, Jr.  
Susan C. Yu

13 SANGER & SWYSEN  
14 Robert M. Sanger

15 OXMAN & JAROSCAK  
16 Brian Oxman

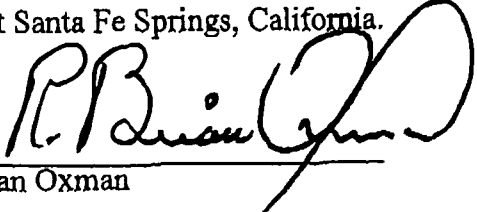
17 By:   
18 R. Brian Oxman  
19 Attorneys for defendant,  
20 Mr. Michael Jackson

DECLARATION OF BRIAN OXMAN

I, Brian Oxman, declare:

1. I am an attorney at law duly licensed to practice law in the courts of the State of California, and an attorney for Michael Jackson.
2. It is necessary that the accompanying Declaration of Brian Oxman Requesting Signature of Order Modifying Subpoena to Bank of the West and the Venturas and accompanying documents be filed under seal in order to protect the overriding interests of Mr. Jackson's rights to due process and a fair trial, as well as to prevent the disclosure of witnesses, potential witnesses and potential evidence.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 18th day of February, 2005 at Santa Fe Springs, California.

  
\_\_\_\_\_  
R. Brian Oxman

EX PARTE APPLICATION TO FILE UNDER SEAL

